

**BEFORE THE  
MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

**In the Matter of the Accusation  
Against:**

**Seo Myong Yang, M.D.**

**Physician's and Surgeon's  
Certificate No. A 30954**

**Respondent.**

**Case No. 800-2020-072593**

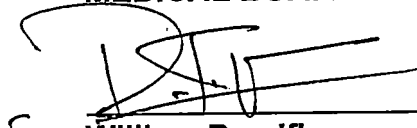
**DECISION**

**The attached Stipulated Surrender of License and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.**

**This Decision shall become effective at 5:00 p.m. on April 15, 2022.**

**IT IS SO ORDERED April 8, 2022.**

**MEDICAL BOARD OF CALIFORNIA**



**For: William Prasifka  
Executive Director**

**Reji Varghese  
Deputy Director**

1 ROB BONTA  
Attorney General of California  
2 STEVEN D. MUNI  
Supervising Deputy Attorney General  
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8 *Attorneys for Complainant*

9  
10 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**  
12

13 In the Matter of the Accusation Against:

14 **SEO MYONG YANG, M.D.**  
1736 N. Gratton Road  
15 Turlock, CA 95382

16 **Physician's and Surgeon's Certificate**  
No. A 30954

17 Respondent.  
18

Case No. 800-2020-072593

OAH No. 2022010587

**STIPULATED SURRENDER OF  
LICENSE AND DISCIPLINARY ORDER**

19  
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. William Prasifka (Complainant) is the Executive Director of the Medical Board of  
24 California (Board). He brought this action solely in his official capacity and is represented in this  
25 matter by Rob Bonta, Attorney General of the State of California, by Aaron L. Lent, Deputy  
26 Attorney General.

27 2. Seo Myong Yang, M.D. (Respondent) is representing himself in this proceeding and  
28 has chosen not to exercise his right to be represented by counsel.

3. On or about April 4, 1977, the Board issued Physician's and Surgeon's Certificate No. A 30954 to Seo Myong Yang, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2020-072593 and expired on October 31, 2021.

## JURISDICTION

4. Accusation No. 800-2020-072593 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on September 14, 2021. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 800-2020-072593 is attached as Exhibit A and incorporated by reference.

## ADVISEMENT AND WAIVERS

6. Respondent has carefully read, and understands the charges and allegations in Accusation No. 800-2020-072593. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Disciplinary Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at his own expense; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

9. Respondent admits the truth of each and every charge and allegation in Accusation No. 800-2020-072593, agrees that cause exists for discipline and hereby surrenders his Physician's and Surgeon's Certificate No. A 30954 for the Board's formal acceptance.

10. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Physician's and Surgeon's Certificate without further process.

## CONTINGENCY

11. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

13. This Stipulated Surrender and Disciplinary Order is intended by the parties herein to be an integrated writing representing the complete, final, and exclusive embodiment of the agreements of the parties in the above-entitled matter.

14. The parties agree that copies of this Stipulated Surrender and Disciplinary Order, including copies of the signatures of the parties, may be used in lieu of original documents and signatures and, further, that such copies shall have the same force and effect as originals.

15. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

## ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 30954, issued to Respondent Seo Myong Yang, M.D., is surrendered and accepted by the Board.

1           1.     The surrender of Respondent's Physician's and Surgeon's Certificate and the  
2 acceptance of the surrendered license by the Board shall constitute the imposition of discipline  
3 against Respondent. This stipulation constitutes a record of the discipline and shall become a part  
4 of Respondent's license history with the Board.

5           2.     Respondent shall lose all rights and privileges as a licensed physician and surgeon in  
6 California as of the effective date of the Board's Decision and Order.

7           3.     Respondent shall cause to be delivered to the Board his pocket license and, if one was  
8 issued, his wall certificate on or before the effective date of the Decision and Order.

9           4.     If Respondent ever files an application for licensure or a petition for reinstatement in  
10 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
11 comply with all the laws, regulations and procedures for reinstatement of a revoked or  
12 surrendered license in effect at the time the petition is filed, and all of the charges and allegations  
13 contained in Accusation No. 800-2020-072593 shall be deemed to be true, correct and admitted  
14 by Respondent when the Board determines whether to grant or deny the petition.

15          5.     Respondent shall pay the agency its costs of investigation and enforcement in the  
16 amount of \$3,618.75 prior to issuance of a new or reinstated license.

17          6.     If Respondent should ever apply or reapply for a new license or certification, or  
18 petition for reinstatement of a license, by any other health care licensing agency in the State of  
19 California, all of the charges and allegations contained in Accusation, No. 800-2020-072593 shall  
20 be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
21 Issues or any other proceeding seeking to deny or restrict licensure.

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1 ACCEPTANCE

2 I have carefully read the Stipulated Surrender of License and Disciplinary Order. I  
3 understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate.  
4 I enter into this Stipulated Surrender of License and Disciplinary Order voluntarily, knowingly,  
5 and intelligently, and agree to be bound by the Decision and Order of the Medical Board of  
6 California.

7  
8 DATED: 2-21-2022

Seo Myong Yang  
SEO MYONG YANG, M.D.  
Respondent

10 ENDORSEMENT

11 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
12 for consideration by the Medical Board of California of the Department of Consumer Affairs.

13  
14 DATED: March 3, 2022

Respectfully submitted,

15 ROB BONTA  
Attorney General of California  
16 STEVEN D. MUNI  
Supervising Deputy Attorney General

17 Aaron L. Lent  
18 AARON L. LENT  
19 Deputy Attorney General  
20 Attorneys for Complainant

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**Exhibit A**

**Accusation No. 800-2020-072593**

1 ROB BONTA  
Attorney General of California  
2 STEVEN D. MUNI  
Supervising Deputy Attorney General  
3 AARON L. LENT  
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10 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 800-2020-072593

14 **SEO MYONG YANG, M.D.**  
1736 N. Graton Road  
15 Turlock, CA 95380

**A C C U S A T I O N**

16 **Physician's and Surgeon's Certificate**  
No. A 30954,  
17

Respondent.  
18

19  
20 **PARTIES**

21 1. William Prasifka (Complainant) brings this Accusation solely in his official capacity  
22 as the Executive Director of the Medical Board of California, Department of Consumer Affairs  
23 (Board).

24 2. On or about April 4, 1977, the Medical Board issued Physician's and Surgeon's  
25 Certificate No. A 30954 to Seo Myong Yang, M.D. (Respondent). The Physician's and  
26 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought  
27 herein and will expire on October 31, 2021, unless renewed.

28 ///



## JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2227 of the Code provides that a licensee who is found guilty under the Medical Practice Act may have his or her license revoked, suspended for a period not to exceed one year, placed on probation and required to pay the costs of probation monitoring, or such other action taken in relation to discipline as the Board deems proper.

5. Section 2234 of the Code, states in pertinent part:

"The board shall take action against any licensee who is charged with unprofessional conduct.<sup>1</sup> In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

"(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.

"...

"(e) The commission of any act involving dishonesty or corruption that is substantially related to the qualifications, functions, or duties of a physician and surgeon.

"(f) Any action or conduct that would have warranted the denial of a certificate.

"..."

6. Section 2236 of the Code states in pertinent part:

"(a) The conviction of any offense substantially related to the qualifications, functions, or duties of a physician and surgeon constitutes unprofessional conduct within the meaning of this chapter [Chapter 5, the Medical Practice Act]. The record of conviction shall be conclusive evidence only of the fact that the conviction occurred.

"(d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is deemed to be a conviction within the meaning of this section and Section 2236.1. The record of conviction shall be conclusive evidence of the fact that the conviction occurred."

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<sup>1</sup> Unprofessional conduct under California and Business Code §2234 is conduct which breaches the rules of the ethical code of the medical profession, or conduct which is unbecoming to a member in good standing of the medical profession, and which demonstrates an unfitness to practice medicine. (*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 564, 575.)

1           7.       Section 802.1 of the Code states:

2                   “(a) (1) A physician and surgeon, osteopathic physician and surgeon, a doctor of  
3                   podiatric medicine, and a physician assistant shall report either of the following to the  
4                   entity that issued his or her license:

5                           (A) The bringing of an indictment or information charging a felony against the  
6                   licensee.

7                           (B) The conviction of the licensee, including any verdict of guilty, or plea of guilty  
8                   or no contest, of any felony or misdemeanor.

9                           (2) The report required by this subdivision shall be made in writing within 30 days  
10                   of the date of the bringing of the indictment or information or of the conviction.

11                           (b) Failure to make a report required by this section shall be a public offense  
12                   punishable by a fine not to exceed five thousand dollars (\$5,000).”

13           8.       Section 118, subdivision (b), of the Code provides that the suspension/expiraton/  
14           surrender/cancellation of a license shall not deprive the Board/Registrar/Director of jurisdiction to  
15           proceed with a disciplinary action during the period within which the license may be renewed,  
16           restored, reissued or reinstated.

#### 17                                   **STATUTORY PROVISIONS**

18           9.       California Code of Regulations, title 16, section 1360, states:

19                   For the purposes of denial, suspension or revocation of a license, certificate or  
20                   permit pursuant to Division 1.5 (commencing with Section 475) of the code, a crime  
21                   or act shall be considered to be substantially related to the qualifications, functions or  
22                   duties of a person holding a license, certificate or permit under the Medical Practice  
23                   Act if to a substantial degree it evidences present or potential unfitness of a person  
24                   holding a license, certificate or permit to perform the functions authorized by the  
25                   license, certificate or permit in a manner consistent with the public health, safety or  
26                   welfare. Such crimes or acts shall include but not be limited to the following:  
27                   Violating or attempting to violate, directly or indirectly, or assisting in or abetting the  
28                   violation of, or conspiring to violate any provision of the Medical Practice Act.

#### 29                                   **FACTUAL ALLEGATIONS**

30           10.      On or about November 8, 2020, at approximately 4:00 p.m., within the County of  
31           Stanislaus, Stanislaus Sherriff's Department Deputies were dispatched to a residence in the City  
32           of Turlock, California regarding Respondent standing in the middle of the roadway, acting in a  
33           strange manner, and attempting to prevent vehicles from passing him. When deputies arrived,  
34           Respondent was no longer standing in the street but was operating a Bobcat tractor on his

1 property and refused to speak with the officers. Sherriff's deputies did speak with Respondent's  
2 wife at the scene who advised the officers that earlier she was afraid of Respondent's behavior  
3 and had called emergency 9-1-1. The deputies advised Respondent's wife to call emergency 9-1-1  
4 again if Respondent continued to act in a strange manner.

5 11. On or about November 8, 2020, at approximately 5:30 p.m., within the County of  
6 Stanislaus, Stanislaus Sherriff's Department Deputies were again dispatched to Respondent's  
7 residence in the City of Turlock, California due to Respondent's wife calling emergency 9-1-1 to  
8 report that Respondent was acting violently. When the deputies arrived at the location, they were  
9 wearing Stanislaus County Sheriff's uniforms and driving clearly marked Stanislaus County  
10 Sheriff's vehicles.

11 12. The deputies observed Respondent operating a Bobcat tractor on the property with  
12 the trailer lights on and the tractor arms in a raised position. The deputies attempted to contact  
13 Respondent by flashing their lights towards the Bobcat and shouting "come here" while also  
14 verbally identifying themselves from the Stanislaus Sheriff's Office. The deputies asked  
15 Respondent if he was okay, to which he responded that he was fine while also saying something  
16 inaudibly. When the deputies asked Respondent what he just said, Respondent said, "Fuck you"  
17 while the Bobcat tractor moved forward towards the deputies.

18 13. The deputies radioed dispatch for emergency radio traffic and additional law  
19 enforcement units. Respondent then began to drive the Bobcat tractor through his fence line and  
20 onto the roadway towards a Stanislaus County Sheriff's Deputy in his fully marked patrol vehicle  
21 with his red and blue flashing lights on. At this time, Respondent's wife repeatedly yelled to  
22 Respondent to stop. The Bobcat tractor drove through the fence and sped towards the Sheriff's  
23 patrol vehicle. Respondent attempted to ram one of the deputies in his patrol vehicle with the  
24 Bobcat tractor which the deputy avoided by maneuvering his patrol vehicle out of the striking  
25 path of Respondent's Bobcat tractor. In response to Respondent's actions, the deputies again  
26 called over their radios that they needed additional sheriff's units to the location.

27 14. Deputies then observed Respondent's attempts to ram a civilian vehicle driving on  
28 the roadway. During this time, the Bobcat tractor's arms were lowered and raised repeatedly. One

1 of the deputies utilized the siren and air horn on his Sheriff's patrol vehicle in an attempt to  
2 distract Respondent from colliding with the civilian vehicle on the roadway. In response to the  
3 situation, the deputies discharged approximately fifteen rounds from their firearms at the Bobcat  
4 and Respondent, as the Bobcat tractor continued to operate and turn towards another Sheriff's  
5 deputy.

6 15. Once the Bobcat came to a stop with its arms raised and lights on, the deputies  
7 commanded Respondent, who was still seated and operating the Bobcat tractor, multiple times to  
8 show his hands and to turn the Bobcat tractor off. Respondent repeatedly told the deputies that he  
9 could not. When the deputies told Respondent that if he turned the Bobcat tractor on, they would  
10 shoot him, the Respondent told them to "go" and that he wanted to die. Respondent then told the  
11 deputies that he was so happy that he was going to die, called one of the deputies a "son of a  
12 bitch," and told the deputies to kill him. Respondent repeatedly told the deputies that he was  
13 happy and to kill him, while being uncooperative, and not following the commands of the  
14 deputies to exit the Bobcat tractor. Respondent then told deputies to shoot him in his head, while  
15 pointing to his forehead, and again verbally asked to be killed by the deputies. Deputies told  
16 Respondent that they want to help him and that they did not want to hurt him, to which  
17 Respondent yelled back that he did not want to talk, wanted to die, and did not want to live  
18 anymore. While still in the Bobcat tractor, one of the deputies approached Respondent, placed  
19 handcuffs on his wrists, and assisted him out of the Bobcat tractor.

20 16. After the incident took place, neighbors and witness were interviewed who stated  
21 they heard the gun shots. One witness stated he observed Respondent driving erratically in the  
22 Bobcat tractor and heard the deputies giving commands to Respondent. One neighbor observed  
23 Respondent using the Bobcat tractor in a ramming manner, saw a Sheriff's vehicle, heard  
24 deputies command Respondent to exit the Bobcat tractor, and saw Respondent refuse those  
25 commands. That same neighbor heard the deputies tell Respondent that they did not want to shoot  
26 him and heard Respondent yell to the deputies "you will have to kill me...kill me," that  
27 Respondent wanted to die, and then he heard approximately four to six gun shots.

28

1       17. Respondent was placed under arrest for assault with a deadly weapon, a violation of  
2 California Penal Code §245, subdivision (a), sub-paragraph (1).

3       18. On or about November 13, 2020, the Stanislaus County District Attorney filed a  
4 criminal complaint against Respondent in the matter entitled, *The People of the State of*  
5 *California v. Seo Myong Yang*, Stanislaus County Superior Court Case No. CR-20-010595, for  
6 violations of California Penal Code §245, subdivision (a), sub-paragraph (1) [felony assault with  
7 a deadly weapon], and California Penal Code §245, subdivision (c), [felony assault on a peace  
8 officer with a deadly weapon], in two separate counts<sup>2</sup>.

9       19. On or about February 8, 2021, the Stanislaus County Superior Court conducted a  
10 preliminary examination in the matter entitled, *The People of the State of California v. Seo Myong*  
11 *Yang*, Stanislaus County Superior Court Case No. CR-20-010595, and found sufficient and  
12 probable cause that Respondent committed the conduct alleged in the criminal complaint. The  
13 Superior Court Judge also determined there was sufficient and probable cause to hold Respondent  
14 to answer for an additional violation of California Penal Code §245, subdivision (c), [felony  
15 assault on a peace officer with a deadly weapon].

16       20. On or about February 22, 2021, Respondent was arraigned in the Stanislaus County  
17 Superior Court on a Criminal Information in the matter entitled, *The People of the State of*  
18 *California v. Seo Myong Yang*, Stanislaus County Superior Court Case No. CR-20-010595, for a  
19 violation of California Penal Code §245, subdivision (a), sub-paragraph (1) [felony assault with a  
20 deadly weapon], and two counts of violating California Penal Code §245, subdivision (c), [felony  
21 assault on a peace officer with a deadly weapon], in three separate counts.

22       21. On or about May 13, 2021, Respondent was convicted upon his pleas of *nolo*  
23 *contendere* to two lesser included felony offenses as to the first two counts of the Criminal  
24 Information in the matter entitled, *The People of the State of California v. Seo Myong Yang*,

25       <sup>2</sup> Such crimes are classified as “serious” felonies and strike offenses pursuant to California  
26 Penal Code §1192.7(c)(11) and §1192.7(c)(23). They are also acts of moral turpitude (*People v.*  
27 *Castro* (1985) 38 Cal.3d 301, 314), i.e., “...acts of baseness, vileness or depravity in the private  
28 and social duties which a man owes to his fellowmen, or to society in general, contrary to the  
accepted and customary rule of right and duty between man and man.” (*In re Craig* (1938) 12  
Cal.2d 93, 97; see also *People v. Cavazos* (1985) 172 Cal.App.3d 589, *People v. Elwell* (1988)  
206Cal.App.3d 171, and *People v. Thomas* (1988) 206 Cal.App.3d 689.)

1 Stanislaus County Superior Court Case No. CR-20-010595, i.e. felony assaults likely to produce  
2 great bodily harm in violations of California Penal Code §245, subdivision (a), sub-paragraph (4).  
3 All parties in the criminal matter stipulated that the February 8, 2021 preliminary examination  
4 transcript was a factual basis for Respondent's plea. Respondent was sentenced to the following:  
5           A. imposition of sentence suspended with felony formal probation for two years;  
6           B. custodial credits were 373 days' time served in the county jail;  
7           C. ordered to obey all laws;  
8           D. report to probation between the 1<sup>st</sup> and 15<sup>th</sup> of each month, or unless otherwise  
9 instructed by probation;  
10          E. notify probation of any change of address;  
11          F. not own possess any firearms or ammunition;  
12          G. submit his person & vehicle & residence to search and seizure by law  
13 enforcement;  
14          H. enroll and complete any counseling that probation directs him to that includes  
15 mental health counseling through the integrated forensic team (IFT) at  
16 Behavioral Health Services;  
17          I. submit a DNA sample;  
18          J. make restitution; and  
19          K. ordered not to practice or attempt to practice medicine as a term of his  
20 probation.

21           22. Thirty (30) days from the arraignment of the Information and of the convictions in  
22 the matter entitled, *The People of the State of California v. Seo Myong Yang*, Stanislaus County  
23 Superior Court Case No. CR-20-010595, have lapsed without Respondent reporting either of  
24 which to the Medical Board of California.

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**FIRST CAUSE FOR DISCIPLINE**

**(Conviction of Crimes Substantially Related to the Qualifications, Functions, or Duties of a Physician and Surgeon)**

23. Respondent Seo Myong Yang, M.D. has subjected his Physician's and Surgeon's Certificate No. A 30954 to disciplinary action under section 2234, as defined by section 2236 of the Code, in that he has been convicted of two felony criminal offenses substantially related to the practice of medicine.

24. Paragraphs 10 through 22, above, are incorporated by reference and realleged as if fully set forth herein.

**SECOND CAUSE FOR DISCIPLINE**

**(Unprofessional Conduct)**

25. Respondent Seo Myong Yang, M.D. has subjected his Physician's and Surgeon's Certificate No. A 30954 to disciplinary action under section 2234 of the Code, in that he has committed acts or engaged in conduct which breaches the rules or ethical code of the medical profession, or conduct which is unbecoming to a member in good standing of the medical profession, and which demonstrates an unfitness to practice medicine.

26. Paragraphs 10 through 22, above, are incorporated by reference and realleged as if fully set forth herein.

**THIRD CAUSE FOR DISCIPLINE**

**(Failure to Report Information & Convictions to the Board)**

27. Respondent Seo Myong Yang, M.D. has subjected his Physician's and Surgeon's Certificate No. A 30954 to disciplinary action under sections 2227 and 2234, as defined by section 802.1 of the Code, in that he failed to disclose his felony convictions and arraignment of his criminal information in the *People of the State of California v. Seo Myong Yang* in Stanislaus County Superior Court, Case No. CR-20-010595 to the Medical Board of California;

28. Paragraphs 10 through 22, above, are incorporated by reference and realleged as if fully set forth herein.

1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
3 and that following the hearing, the Medical Board of California issue a decision:


4 1. Revoking or suspending Physician's and Surgeon's Certificate No. A 30954, issued  
5 to Respondent Seo Myong Yang, M.D.;

6 2. Revoking, suspending or denying approval of Respondent Seo Myong Yang, M.D.'s  
7 authority to supervise physician assistants and advanced practice nurses;

8 3. Ordering Respondent Seo Myong Yang, M.D., if placed on probation, to pay the  
9 Board the costs of probation monitoring; and

10 4. Taking such other and further action as deemed necessary and proper.

11  
12 DATED: SEP 14 2021

  
13 WILLIAM PRASIFKA  
14 Executive Director  
15 Medical Board of California  
16 Department of Consumer Affairs  
17 State of California  
18 Complainant

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